

1       \$70, but that was \$70 I did not have to spend at that point.

2           Q     I am now going to show you some documents which I  
3     am going to -- after we're going to look at them, I'm going  
4     to have -- we're going to take a break, have them copied and  
5     then have the court reporter actually mark them as exhibits  
6     to this deposition.

7           A     Okay.

8           Q     However, these are originals and so I'm not going  
9     to actually have these marked. First I want you to just  
10    look at the entire stack and see if you recognize this stack  
11    of documents and then I'm going to ask you some questions  
12    about the entire stack?

13          A     Yes, I recognize these.

14          Q     And are these -- okay -- actually, with the entire  
15    stack of documents, did you put them in the order they are  
16    now, yourself?

17          A     Yes, I did.

18          Q     And did you put a staple in the top center and  
19    staple them together?

20          A     Actually it ended up that I did not, the notary  
21    did because it was her stapler. Teresa, I can't read her  
22    last name, at First Nationwide Bank on Third Street --  
23    Fourth Street in San Mateo.

24          Q     And --

25          A     She stapled it in front of me.

1           Q     And to the appearance they have remained in the  
2     condition they were when they were stapled in front of you?

3           A     Yes.

4           Q     And you signed the back of each page, other than  
5     the two page affidavit at the front, correct?

6           A     Other than that, and also the notary's  
7     acknowledgement.

8           Q     Okay. After putting them in this order and having  
9     them stapled in front of you, having the back of each page  
10    signed, what did you do with the documents?

11          A     I put them in a Federal Express letter envelope  
12    and put in an address label that was pre-addressed to Tom  
13    Carroccio at his law firm in Washington D.C. I dropped it  
14    off at the Federal Express Office, handed it over to the  
15    clerk there.

16          Q     Okay. Now, I'm going to have you remove the  
17    staple.

18          A     I told you I'm fanatically neat, I would not just  
19    pull out a staple like that.

20          Q     Okay. Now we're going to take them apart.

21          A     Okay.

22          Q     The first two pages, which I will -- the first two  
23    pages I'm going to have the court reporter later mark as  
24    Exhibit 1 to your deposition.

25          A     Okay.

1                               (Thereupon, the document  
2                               referred to was marked for  
3                               identification as Exhibit 1.)

4           Q     Can you tell us what those two pages are?

5           A     They are my affidavit attesting to how I acquired  
6               these papers and how I transferred them to Tom Carroccio,  
7               and I apologize I forgot to put page numbers on here.

8           Q     Okay. The next page is what, and it's a single  
9               page, which I'll have the reporter mark as Exhibit 2.

10                           (Thereupon, the document  
11                           referred to was marked for  
12                           identification as Exhibit 2.)

13           A     It is a pre-printed and filled in California All  
14               Purpose Acknowledgement.

15           Q     And this is essentially the Notary's seal to your  
16               affidavit, correct?

17           A     Yes, it is.

18           Q     Okay. The next two pages, which are stapled  
19               together, I'm going to have the court reporter mark as  
20               Exhibit 3. Can you tell us what those two pages are?

21                           (Thereupon, the document  
22                           referred to was marked for  
23                           identification as Exhibit 3.)

24           A     These are the pages that I believe everybody else  
25               refers to as Control P. It has a header on the left side

1 that says J:/PCSWIMSY/EXPORT/To\_FCC/M0123011.DBF. The  
2 header on the right top side says, Round 11. It's a two  
3 page document which shows, I believe, the bids that we  
4 submitted on January 23, 1996, Round 11.

5 Q Now, there is some handwriting on the right  
6 column?

7 A Yes.

8 Q Upper right. Do you recognize that handwriting?

9 A Yes. It shows Terry Easton's initials, the date  
10 January 23rd and the time of 9:32 a.m.

11 Q And is this the form you pulled out of the trash  
12 can?

13 A Yes, it is.

14 Q And it appears in the condition now, as far as you  
15 can tell, as it did when you pulled it out of the trash can,  
16 you don't see anything added or changed to it?

17 A There's some yellow highlighting on the page that  
18 I don't recall when that was put there.

19 Q Okay.

20 A None of the highlighted entries mean anything to  
21 me, so I don't know if I put them there, if somebody else  
22 did before I pulled them out of the trash can, I just really  
23 don't recall.

24 Q And if you could find the Norfolk market on there,  
25 is it one of the highlighted ones?

1           A     No, it's not.

2           Q     And does that indeed show 180 million dollar bid  
3     for the Norfolk market?

4           A     \$180,060,000.00.

5           Q     And since it has the date 23 January and 9:32  
6     a.m., does this mean that Terry Easton signed this on the  
7     23rd of January at 9:32 a.m.?

8           A     Yes, I saw him sign this.

9           Q     He actually signed it in front of you?

10          A     Yes.

11          Q     Okay. Next is a three page document which I will  
12     have marked as Exhibit 4, they are also stapled together  
13     already. Can you tell me what this document is?

14                     (Thereupon, the document  
15                     referred to was marked for  
16                     identification as Exhibit 4.)

17          A     This document is what I would describe as a screen  
18     print, I would print it from the FCC's bidding software, and  
19     it would give me sort of a title page that shows the auction  
20     I.D., simple information as authorized bidders, and our  
21     maximum eligibility and the activity required. And then on  
22     the next two pages it shows the bids that we uploaded to the  
23     FCC software.

24          Q     And was this also a document you pulled from your  
25     trash can?

1 A Yes, it is.

2 Q And this was what -- at what point would this have  
3 been printed out?

4 A This would be printed after we had uploaded the  
5 file from the server into the FCC bidding software, and  
6 prior to actually submitting the bid.

7 Q So, to make sure I have it straight, after say  
8 what we've seen in Exhibit 3, Mr. Easton would -- and what's  
9 been referred to as the Control P Report -- Mr. Easton would  
10 prepare this, sign it, then you would upload it into your  
11 computer and then be able to print what you're now calling  
12 the screen print, is that correct?

13 A Yes.

14 Q And try to find the Norfolk market on there and  
15 let me know if that also reflects 180 million dollar bid?

16 A Yes, it does.

17 Q And again, this was pulled from your trash can?

18 A Yes, it was.

19 Q And it appears to you to be the original document  
20 that you pulled from the trash can?

21 A Yes, it does.

22 Q After you pulled it from your trash can, and until  
23 you sent it to Mr. Carroccio, did it ever leave your  
24 possession?

25 A Yes, for about five minutes.

1 Q And whose possession was it in at that time?

2 A That was in Fred Gross' possession, he made copies  
3 for me.

4 Q Okay. And did he keep the copy and you keep the  
5 original?

6 A No. I took the copies, I kept some for myself,  
7 and I mailed some to three people.

8 Q And who are those three people?

9 A One copy went to Rosalind Makris. And when I say  
10 copies, I refer to the Control P, this, and the next  
11 document we're going to talk about.

12 Q Okay.

13 A I sent a copy to my brother. And a copy to my  
14 former roommate in New York, Cecilia Langram.

15 Q And what was the reason for doing this?

16 A This was the night of January 23rd, I was  
17 terrified of what Terry might do if he figured out that I  
18 had these papers, and I sent these copies in case anything  
19 happened to me or the papers, the originals.

20 Q Next is a ten page document, all of which are  
21 stapled together, which I will have the court reporter mark  
22 as Exhibit 5. And can you tell me what this is?

23 (Thereupon, the document  
24 referred to was marked for  
25 identification as Exhibit 5.)

1           A     This is a document that Terry would also print  
2 prior to me uploading the bid. And I believe that it shows  
3 all of the markets that were available to be bid on. It's  
4 sorted in descending order by POPS, the number of people in  
5 the population. It has -- it's an Excel spreadsheet and  
6 each cell has a background color of either white, light grey  
7 or dark grey. The white fields, I believe, are fields that  
8 we had nothing to do with. The shaded, the light shaded  
9 fields, I believe, were bids that we were placing that day.  
10 The dark shaded fields, I believe, are bids that we had the  
11 high market on as of that date.

12           Q     And was this also a document you pulled from your  
13 trash can that afternoon?

14           A     Yes.

15           Q     And see if you can find the Norfolk market on  
16 there as well?

17           A     Yes.

18           Q     And does it also reflect 180 million dollar bid?

19           A     Yes.

20           Q     And does this also appear to be in the condition  
21 it was at the time you sent it to Mr. Carroccio?

22           A     Yes.

23           MR. WEBBER: Let's go off the record for a second.

24           (Off the record.)

25           MR. WEBBER: Back on the record.



1 BY MR. WEBBER:

2 Q The next document that was in the stack, and also  
3 once again you are attesting or agreeing to the fact that  
4 I'm giving them to you in the same order in which you had  
5 stapled them and sent them to Mr. Carroccio, correct?

6 A Yes.

7 Q The next document, which I will have the court  
8 reporter mark as Exhibit 6, is a four page document which  
9 are also currently stapled together. Can you tell me what  
10 this document is?

11 (Thereupon, the document  
12 referred to was marked for  
13 identification as Exhibit 6.)

14 A This is my handwritten declaration of January 24,  
15 1996, explaining the events of January 23, 1996.

16 Q Okay. And we've already discussed that. The next  
17 document, you'll have to tell me if they actually go  
18 together, it may be a two page document or they may be two  
19 separate pages and I'm going to let you tell me whether  
20 these two go together or not?

21 A They go together.

22 Q Okay. So, it's a two page document and I'll have  
23 the reporter mark that as Exhibit 7. Can you tell me what  
24 Exhibit 7 is?

25 //

1 (Thereupon, the document  
2 referred to was marked for  
3 identification as Exhibit 7.)

4 A Okay. Exhibit 7, the order I stapled it in is  
5 actually backwards. The what would appear to be the first  
6 page is a handwritten document dated January 24, 1996,  
7 addressed To Whom It May Concern, it's my resignation that I  
8 faxed to San Mateo Group. What was stapled as the second  
9 page, which actually is the fax cover sheet that went along  
10 with my resignation, it's addressed to Ronit Milstein at San  
11 Mateo Group.

12 Q Okay. And that is the summation of all the  
13 documents that we've just unstapled, correct, and that were  
14 sent to Mr. Carroccio?

15 A Yes.

16 Q Did there come a time where Mr. David Wilson  
17 interviewed you about these events?

18 A Yes.

19 Q Did you meet with him in person?

20 A Yes, I did.

21 Q And did you meet with him more than once?

22 A No, I met with him only one time.

23 Q Did you meet with anybody else in his home?

24 A No, we spoke on the phone, but I actually met with  
25 him only once.

1           Q     How many times would you say you spoke with him on  
2     the phone?

3           A     At least twice before I met with him for the  
4     interview, and I believe once or twice, twice afterwards as  
5     well.

6           Q     Did he seem generally interested in finding out  
7     what you knew or did he seem to have an agenda already to  
8     find Mr. Easton responsible?

9           A     Well, considering that he asked open questions  
10    rather than leading questions, I would say that he was  
11    interested in finding out what happened rather than having  
12    an agenda.

13          Q     Did he ever try to slant you -- that's not fair --  
14    he seemed to be asking fair questions, I guess is what I'm  
15    asking?

16          A     Yes.

17          Q     Did there come a time where you submitted the  
18    declaration you gave to the FCC to anybody-at PCS 2000?

19          A     Yes. In early February, I don't recall the exact  
20    date, I received a copy of PCS 2000's Request for Waiver  
21    dated January 26th.

22          Q     And how did you receive a copy of that?

23          A     Bill Kennard sent me a copy. I called up, I  
24    believe it was Bill that I spoke to -- and one thing is I  
25    have to clarify for the record again time seemed to be much

1 longer at that point -- and I called him up and I said I  
2 can't believe they filed this, I told Quentin what happened.  
3 What I later realized, to my horror, was that the papers had  
4 already been filed by the time I talked to Quentin, so my  
5 statement to the FCC was incorrect that Quentin knew, that I  
6 had told Quentin of what had happened prior to that waiver  
7 being filed. In actuality, I had talked to Quentin after it  
8 had been filed and after the FCC was closed for business  
9 that day.

10 I thought about it and called the FCC back. I did  
11 not reach Bill, I left him a message and I said I have to  
12 let Javier know. That coincided with Fred Gross had told me  
13 that Javier had hired Arthur Anderson, I believe, to --

14 Q Or maybe Price Waterhouse?

15 A Price Waterhouse, sorry, to do an investigation.  
16 And I had been sort of sitting back to find out who was  
17 going to dig into this and see what happened. Since it was  
18 Javier, Javier is the one that I called and told him what  
19 happened, told him that I had copies of papers and that I  
20 had notified the FCC.

21 Q And what was Javier's reaction?

22 A He was totally shocked, very upset, he said -- he  
23 asked me if he could hang up and have me call him back, or  
24 he was going to call me, back, I don't remember, from Fred  
25 Martinez's office, who I believe just is across the street,

1 and so that Fred could hear the story as well.

2 He asked me to fax him a copy of the papers. He  
3 was horrified because one of the things he said is that he  
4 had gone before the FCC, as he puts it, on bended knee,  
5 asking to not be given the huge penalty that was there. And  
6 he said they were very cold, and he said now he understood  
7 why, and he was horrified.

8 He's one of these guys that he's very modern, he's  
9 proud of his working wife, she's working on this fantastic  
10 stuff about the Puerto Rico legislator going from bi-cameral  
11 (phonetic), to unicameral (phonetic). He was very proud of  
12 her, but he also has the old world hispanic sense of honor,  
13 and he was most horrified that he had gone before the FCC  
14 and that they thought that he knew that his request was  
15 based on lies.

16 Q And it was your impression that he absolutely had  
17 no idea that there were allegations made that Mr. Easton may  
18 have been lying?

19 A That was my impression.

20 Q Did you mention to him, at any point, that you had  
21 told Mr. Breen?

22 A Yes, I did.

23 Q And what was his reaction to that, or did he have  
24 a response to that?

2 A I don't recall. The general tenure, if he said

1 something, and he probably did, would have been that Quentin  
2 didn't say anything to him, but that's more speculation than  
3 actual memory.

4 Q You don't have an actual recollection of him  
5 saying oh, I know, Quentin told me?

6 A No, he never said that. He never indicated that  
7 Quentin said anything to him.

8 Q And when you mentioned that you told Mr. Breen,  
9 was Mr. Martinez also in the room -- or on the call as well?

10 A I believe so.

11 Q And do you recall Mr. Martinez having any reaction  
12 to that?

13 A I don't recall. Through this whole time my focus  
14 has been on what -- on Terry.

15 Q Oh, I understand.

16 A And so, you know, I really didn't focus on  
17 remembering any of this stuff involving Quentin.

18 Q I believe that's all the questions I have. Are  
19 there any -- if we could look back at what I'm going to have  
20 marked as Exhibit 4, which is what you're referring to as  
21 the screen print, and is a three page document, can you --  
22 is there anything else about this document that you want to  
23 point out?

24 A Well, actually it's the absence of any other  
25 documents similar to this that is significant, in that

1 Terry, in his statements, has made excuses saying in one  
2 place that we had electrical problems, in another place that  
3 the print server or fax server were down, and part of that  
4 is an explanation for why he claimed we did not have the  
5 flash reports before withdrawal, which would have given him  
6 the opportunity to withdraw without penalty, which we  
7 actually did have. But, also because since this is a screen  
8 print from the FCC software, this is not a document that he  
9 could have doctored and faked. And so the fact that he did  
10 not include a document looking like this in anything he  
11 faxed to the FCC, or later offered as documents showing what  
12 he claims he actually bid, the actual reason why this is  
13 missing is because he could not recreate this document.

14 Q Because that is the type of document that could  
15 only be created from your station, correct, that could not  
16 be created from one of the other stations?

17 A Well, no, not for that reason, it's because this  
18 document can only be created during the bidding process, and  
19 the bidding process had closed.

20 Q Okay. Right, I understand that.

21 A It could have been recreated if he had sat and  
22 thought about it, he could have scanned it in and changed  
23 it, so it could have been doctored, but that's not what  
24 happened.

25 Q Now, on January 23rd, were there any electrical

1 problems?

2 A No. And to explain a few things that go on as  
3 well, the fax server has nothing to do with the print  
4 server. We did not get any long faxes that would have tied  
5 up anything to do with the printing process. And if we had  
6 had electrical problems, the same electrical problems would  
7 have prevented us from bidding. So, one that would keep me  
8 from printing out this screen would also keep us from  
9 submitting the bid. There were no electrical problems that  
10 day, there were no long faxes that tied up the fax server  
11 that day. We had no printing problems at all.

12 And there's something else I wanted to add, he  
13 said something else about the process, the flash reports  
14 were done on our Unix computer, they were not even done on  
15 the network, so he had made some other comments about there  
16 was something in one of his statements about the network  
17 running out of disk space as well, which also did not happen  
18 and wouldn't have affected the flash reports anyway, because  
19 this was not done on the network.

20 Q All right, thank you. I think that's a very good  
21 explanation. Is there at this point anything else you'd  
22 like to add?

23 A Just that I've seen some of the stuff that Terry  
24 has submitted, actually you guys don't even need me anymore  
25 because his declarations contradict each other enough.



1 There is even a declaration that he submits, in the  
2 Gutierrez report, stating that this is -- the Gutierrez  
3 report states this is a declaration submitted to the FCC,  
4 not only is it not the same declaration but it has an error  
5 in the numbers saying that I think that he bid 180,000  
6 (thousand) instead of 180,000,000 (million). So, that  
7 certainly demonstrates that Terry does not know how to type  
8 that number correctly. But, I think that's it, yeah.

9 MR. WEBBER: All right. Well thank you very much  
10 for your time.

11 THE WITNESS: You're welcome.

12 MR. WEBBER: Off the record.

13 (Thereupon, at 9:05 p.m. the deposition of Cynthia  
14 Hamilton was concluded.)

15 I have read the foregoing pages 1 through 74, and ~~and~~  
16 they are a true and accurate record of my testimony  
17 therein recorded, and any changes and/or corrections  
18 appear on the attached errata sheet signed by me.

19 \_\_\_\_\_  
20 CYNTHIA L. HAMILTON

21 Subscribed and sworn to before me  
22 this \_\_\_\_\_ day of \_\_\_\_\_, 199\_

23 \_\_\_\_\_

24 Notary Public

25 My Commission expires: \_\_\_\_\_

### CERTIFICATE OF REPORTER

I, Margaret Harris, an Electronic Reporter, do  
hereby certify:

That I am a disinterested person herein; that the foregoing Federal Communications Commission, Deposition, was reported by me and thereafter transcribed into typewriting.

I further certify that I am not of counsel or attorney for any of the parties in this matter, nor in any way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand  
this 10th day of February, 1997.

Margaret Harris  
Margaret Harris,  
OFFICIAL REPORTER

BOSTON, NV

Margaret Harris		5-1000
OFFICIAL REPORTER		100
		100
1-107	100	897 000
1-143	100	877 000

JURISDICTION: Federal Communications Commission

Before me, the undersigned authority, personally appeared

Cynthia L. Hamilton who, after being duly sworn states that she has read the foregoing deposition transcript, and states that she wishes to make the following changes or corrections to this transcript for the following reasons:

PAGE	LINE	CHANGE	REASON FOR CHANGE
------	------	--------	-------------------

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper has a slightly textured appearance and is set against a dark background.

The witness states that the deposition transcript, pages \_\_\_\_ through \_\_\_\_, is otherwise true and accurate.

SWORN AND SUBSCRIBED before me on the \_\_\_\_\_ day  
of \_\_\_\_\_, A.D. 19\_\_.

Notary Public

My Commission Expires: \_\_\_\_\_

## Affidavit

I, Cynthia L. Hamilton, under penalty of perjury, hereby declare and state as follows:

1. From June 2, 1995 until January 23, 1996 I was employed by San Mateo Group, at San Mateo Group, Inc.'s offices in San Mateo, California where I assisted in the preparation of the bids of PCS 2000 LP ("PCS 2000") for the broadband PCS C Block Auction conducted by the Federal Communications Commission ("FCC"). My supervisors with regard to auction bidding activities were Anthony T. "Terry" Easton and Quentin L. Breen.
2. On January 23 1996, Mr. Breen was absent from the offices of San Mateo Group, Inc., so all auction bidding activities were directed only by Mr. Easton. I transmitted to the FCC PCS 2000's Round 11 bids which had been prepared, reviewed and approved by Mr. Easton. After the close of Round 11, another employee noticed that PCS 2000's submitted bid for the Norfolk, Virginia BTA was in the amount of \$180,060,000.00 rather than the intended minimum bid of \$18,006,000.00.
3. After Mr. Easton was informed that the submitted bid for the Norfolk, Virginia BTA was erroneous, and following a short absence from my work area, I noticed that certain bidding records that I maintained at my desk were missing. Becoming concerned about the integrity of the bidding records, I retrieved certain Round 11 documents that Mr. Easton had discarded at my work station. After I retrieved the documents, I observed Mr. Easton searching through the trash bin at my desk and on my desk for the documents I had retrieved from the trash and retained of PCS 2000's bidding activity in Round 11.
4. The documents that I retrieved and retained are:
  - i. A printout from the San Mateo Group, Inc. database file entitled: J:\PCSWINMSY\EXPORT\TO\_FCC\M0123011.DBF with a right header of "Round 11." This printout was initialed with date and time by Mr. Easton on the first page of this two page document. I had stapled the two pages of this document together on January 23, 1996, prior to the time Mr. Easton discarded the documents in the trash at my work station.
  - ii. A preview printout from the FCC bidding screen, created after the bids were uploaded to the FCC bidding software. This document has a dated cover page (1 of 1) and a two page list of bids entered into the bidding software. This document was printed prior to the bids being submitted on January 23, 1996, was stapled by me, and compared with the document at that time the copies were printed.

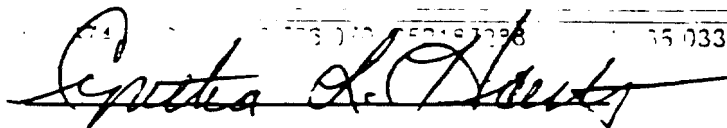
Westfel  
Ex. 1  
2-6-97 -kt

- iii. A ten page document entitled "Print\_All" that highlights markets that PCS 2000 had high bids on as well as the current markets on which PCS 2000 was bidding on January 23, 1996, although the document itself is undated. I stapled this document on that date.

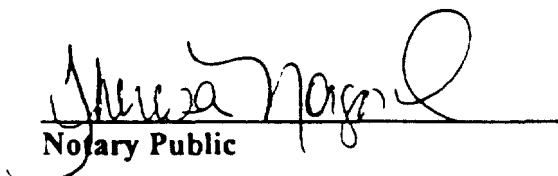
The originals of each of these documents are stapled to this declaration. To authenticate these documents without altering their probative value, I have signed each sheet on the back (unprinted) side.

5. I have also attached the original of my four page declaration that I faxed to the FCC on January 24, 1996, as well as the original of my resignation that I faxed to San Mateo Group, Inc. on the same morning, along with its cover sheet.
6. On those occasions when I spoke with the FCC staff, I reminded them that I still held these original documents, but, as of this date, they have never asked me to deliver the originals of these documents to the FCC or anyone else.
7. In light of my continuing concerns as to the security of these documents, and in light of the FCC's recent actions regarding PCS 2000, LP, I am no longer comfortable maintaining these documents in my home. Accordingly, I am now delivering these documents to A. Thomas Carroccio, Attorney at Law, at Bell, Boyd & Lloyd at 1615 L. Street N.W., Washington, DC 20036 for safekeeping and for use in any FCC proceedings in which these documents would have probative value.
8. The foregoing statements are true and correct to the best of my knowledge and belief.

In witness whereof, I hereby affix my signature this 28<sup>th</sup> day of January, 1997.



SIGNATURE NOTARIZED

  
Notary Public

1/28/97  
Date

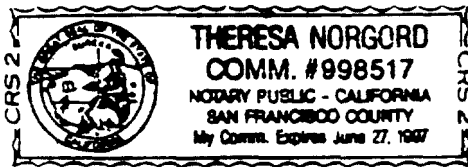
# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

No 5907

State of California  
County of San Mateo

On January 28, 1997 before me, Theresa Norgord Notary Public  
DATE NAME, TITLE OF OFFICER - E.G., "JANE DOE, NOTARY PUBLIC"  
personally appeared Cynthia L. Hamilton  
NAME(S) OF SIGNER(S)

☐ personally known to me - OR - ☒ proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he she they executed the same in his her their authorized capacity(ies), and that by his her their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal:

Theresa Norgord  
SIGNATURE OF NOTARY

## OPTIONAL

Though the data below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent reattachment of this form.

### CAPACITY CLAIMED BY SIGNER

- ☒ INDIVIDUAL  
☐ CORPORATE OFFICER

TITLE(S)

- ☐ PARTNER(S) ☐ LIMITED  
☐ GENERAL  
☐ ATTORNEY-IN-FACT  
☐ TRUSTEE(S)  
☐ GUARDIAN/CONSERVATOR  
☐ OTHER: \_\_\_\_\_

SIGNER IS REPRESENTING:  
NAME OF PERSON(S) OR ENTITY(IES)

### DESCRIPTION OF ATTACHED DOCUMENT

Affidavit

TITLE OR TYPE OF DOCUMENT

3

NUMBER OF PAGES

1/28/97

DATE OF DOCUMENT

N/A

SIGNER(S) OTHER THAN NAMED ABOVE

SELECTED TRADING AREA NAME	BTA#	Population	\$/Pop	Value
Chicago, IL	B-078	8,182,076	\$25.31	\$207,097,000
San Francisco-Oakland-San Jose, CA	B-404	6,420,984	\$22.97	\$147,497,000
Seattle-Tacoma, WA	B-413	2,708,949	\$13.65	\$36,977,000
Pittsburg, PA	B-350	2,507,839	\$14.30	\$35,872,000
San Diego, CA	B-402	2,498,016	\$9.47	\$23,650,000
Phoenix, AZ	B-347	2,404,760	\$16.51	\$39,705,000
San Juan P.R.	B-488	2,170,246	\$8.10	\$17,577,000
Denver, CO	B-110	2,073,952	\$10.50	\$21,780,000
Cincinnati, OH	B-081	1,990,451	\$11.20	\$22,292,000
Kansas City, MO	B-226	1,839,569	\$8.49	\$15,621,000
Charlotte-Gastonia, NC	B-074	1,671,037	\$12.21	\$20,403,000
Sacramento, CA	B-389	1,656,581	\$8.50	\$14,080,000
Norfolk-Virginia Beach-Newport News-Ha	B-324	1,635,296	\$110.11	\$180,060,000
San Antonio, TX	B-401	1,530,954	\$9.17	\$14,037,000
Providence-Pawtucket, RI-New Bedford-F	B-384	1,509,789	\$10.67	\$16,107,000
Columbus, OH	B-095	1,477,891	\$10.93	\$16,149,000
Nashville, TN	B-314	1,429,309	\$11.56	\$16,524,000
Louisville, KY	B-263	1,352,955	\$11.56	\$15,642,000
Mayaguez/Aguadilla - Ponce, P.R.	B-489	1,351,600	\$4.77	\$6,441,000
Indianapolis, IN	B-204	1,321,911	\$11.01	\$14,556,000
Salt Lake City-Ogden, UT	B-399	1,308,035	\$6.24	\$8,162,000
Oklahoma City, OK	B-329	1,305,472	\$8.54	\$11,152,000
Buffalo-Niagara Falls, NY	B-060	1,231,795	\$9.16	\$11,288,000
Birmingham, AL	B-044	1,200,336	\$10.34	\$12,412,000
Hartford, CT	B-184	1,123,678	\$14.58	\$16,378,000
Rochester, NY	B-379	1,118,963	\$8.38	\$9,375,000
Richmond-Petersburg, VA	B-374	1,090,869	\$11.56	\$12,612,000
Raleigh-Durham, NC	B-368	1,089,423	\$10.46	\$11,396,000
New Haven-Waterbury-Meriden, CT	B-318	978,311	\$10.03	\$9,815,000
Knoxville, TN	B-232	948,055	\$8.36	\$7,928,000
West Palm Beach-Boca Raton, FL	B-469	893,145	\$11.01	\$9,834,000
Las Vegas, NV	B-245	857,856	\$12.66	\$10,861,000
Evansville, IN	B-135	504,859	\$2.90	\$1,464,000
Youngstown-Warren, OH	B-484	492,619	\$2.90	\$1,429,000
Charleston, WV	B-073	481,387	\$2.90	\$1,397,000
Anchorage, AK	B-014	388,943	\$2.00	\$777,886
Bangor, ME	B-030	316,838	\$3.00	\$951,000
Unica-Rome, NY	B-453	316,633	\$3.75	\$1,188,000
Watertown, NY	B-463	296,253	\$2.00	\$592,506
Waterloo-Cedar Falls, IA	B-462	261,009	\$2.00	\$522,018
Texarkana, TX-AR	B-443	255,983	\$2.00	\$511,966
Bowling Green-Glasgow, KY	B-052	222,748	\$1.31	\$292,100
Sunbury-Shamokin, PA	B-437	187,362	\$2.38	\$445,000
Rapid City, SD	B-369	181,278	\$1.21	\$220,100
Dubuque, IA	B-118	176,542	\$1.94	\$343,100
Columbus-Starkville, MS	B-094	166,415	\$2.18	\$362,000
Jonesboro-Paragould, AR	B-219	159,439	\$1.82	\$290,004
Grand Island-Kearney, NE	B-167	141,541	\$4.08	\$578,000
Burlington, IA	B-061	137,543	\$1.28	\$176,000
Fort Dodge, IA	B-150	131,731	\$1.29	\$170,100

Hutchinson, KS	B-200	125,094	\$1.33	\$166,100
Du Bois-Clearfield, PA	B-117	124,180	\$1.29	\$160,006
Ottumwa, IA	B-337	122,988	\$1.28	\$157,100
Minot, ND	B-299	122,687	\$1.21	\$149,003
Middlesboro-Harian, KY	B-295	121,217	\$1.34	\$162,100
Mount Pleasant, MI	B-307	118,558	\$2.34	\$277,000
Dyersburg-Union City, TN	B-120	113,943	\$1.21	\$138,100
El Dorado-Magnolia-Camden, AR	B-125	108,810	\$1.21	\$132,100
Fairbanks, AK	B-136	92,111	\$1.33	\$122,508
Indiana, PA	B-203	89,994	\$1.32	\$119,100
Longview, WA	B-261	85,446	\$3.30	\$282,000
Logan, UT	B-258	79,415	\$1.32	\$105,100
Marshalltown, IA	B-283	55,695	\$1.35	\$75,100
Huron, SD	B-199	53,189	\$1.24	\$66,100
Totals: Count - 64	Total -	67,112,553	Total -	\$1,027,101,197
New Bids: Count - 41	New Bids	62,340,161	New Bids -	\$1,015,212,000
	Bid Units -	2,013,376,590		
Ave. \$/Pop (Standing): \$2.49				
Ave. \$/Pop (New): \$16.29				
Ave. \$/Pop (All): \$15.30				



Auction ID: 5 Fax: (809)723-8340

Service: Broadband PCS

FCC Acct No.: 0660514434

## Authorized Bidders

JAVIER O LAMOSO

QUENTIN L BREEN

ANTHONY T EASTON

Maximum Eligibility Amount (Bid-Units)	Activity Required	Waivers Remaining	Waivers Used	Current Round	Current Stage
3,333,333,334	2,000,000,000	5	0	11	1

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